



Fw: Hilcorp NPDES Questions

Richard Cool to: Cindi Godsey

07/14/2012 06:59 AM

History: This message has been replied to.

Hi Cindi:

I was not able to get back to Linda on Friday so she sent the attached email. She has added a second issue that was not in her original voice message (No. 2). I will send her an email with our follow-up questions to No. 1 below and you will see that I defer response to No. 2 until you and I have talked. We could decide to do a follow-up email or a call (me or together).

Please call me on Monday when your time permits.

In re No. 2, I have a number of questions that we should discuss and maybe some that could be posed to Linda.

First, her final question on whether it is acceptable to place the oily water in the deck drainage. I am not sure what her focus is. Is the question related to having removed the tubulars to an off-site location and now bringing back the waste for final disposal? Or is her question really about their typical on-platform practice of discharging tubular washings to the deck drainage?

We certainly do not want to open the door for shore-based generated wastes to be hauled out to platforms for disposal.

Second, I am not clear now on exactly how to characterize this waste stream? Is it a maintenance waste subject to the discharge prohibition? Other? Seems like "deck drainage" might becoming a catch-all disposal method but at least if it is "contaminated" with oil and grease it has to be processed through an OWS.

Here are some other (maybe overlapping) questions:

- What is the nature and use of the tubulars? [From description, I suspect either drill pipe from drill string or production piping]
- What process are the tubulars used for?
- Further clarification on the nature/constituents of the washings? [she says oily water]
- Describe typical on-platform cleaning process? What is in the cleaning mixture? Quantities? Frequency of discharge?
- Is this process described and addressed in their BMP Plan? Should it be?

Anything else we should ask?

Later

Rick

----- Forwarded by **Richard Cool**/R10/USEPA/US on 07/14/2012 06:21 AM -----

From: Linda Ward <lward@hilcorp.com>
To: **Richard Cool**/R10/USEPA/US@EPA,
Date: 07/13/2012 04:27 PM
Subject: Hilcorp NPDES Questions

Mr. **Cool**,

I have two questions for your regarding Hilcorp's NPDES Permit:

1. We are looking at adding a temporary over board point on the King Salmon platform . If engineer decides to add the piping and over board point what is the process for informing EPA and obtaining approval?
2. We had to clean several tubulars from one of our platforms and room was tight on the platform so we shipped the tubulars to shore for cleaning. Normally the rinse water would go to deck drainage but we now have the water in tanks onshore at a third party contractor location . We would like to ship the oily water back to the platform and discharge as deck drainage . So is it acceptable to place in our deck drains?

Thank You,

Linda Ward

Environmental Coordinator

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